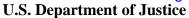
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## United States Attorney Southern District of New York

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March 1, 2017

## **BY ECF**

The Honorable Alison J. Nathan United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Burrell et al., S2 15 Cr. 95 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter, pursuant to the Court's Order dated October 25, 2016, regarding the trial for Group A defendants presently scheduled for May 1, 2017. To the extent there is such a trial, the Government proposes the following schedule, to which no defense counsel has objected:

- Motions in limine, Requests to Charge, and Voir Dire would be due April 3, 2017.
- Responses to motions in limine would be due April 17, 2017.
- The Government would produce 3500 and Giglio material for cooperating witnesses by April 24, 2017; and for all other witnesses by April 28, 2017.
- The Government would produce exhibits by April 28, 2017.

In light of the foregoing agreement, the status of plea negotiations, and the fact that no motions were filed in this case, the parties seek guidance from the Court as to whether the Court still intends to hold a conference on March 3, 2017.

Respectfully submitted,

PREET BHARARA United States Attorney

By: \_\_\_\_/s/\_\_\_\_

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cc: All defense counsel